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and Jay Cohen*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re:**

**CHITTUR & ASSOCIATES, P.C.,**

**Debtor.**

Chapter 11

Case No. 16-22704-rdd

**OBJECTION TO MOTIONS FOR EXTENSION OF EXCLUSIVE PERIODS  
AND TO MOTION TO SET A BAR DATE**

Northern Leasing Systems, Inc. (“Northern”), Lease Finance Group, LLC (“LFG”), Ricardo Brown, Robert Taylor, Joseph I. Sussman, Joseph I. Sussman, P.C., and Jay Cohen (collectively, the “Objectors”), by their attorneys, Moses & Singer LLP, hereby file this objection (the “Objection”) to the Debtor’s Motions to Extend the Exclusive Periods filed on September 25, 2017 at Docket Nos. 127 & 128 and the Debtor’s Motion to Set a Bar Date filed on September 25, 2017 at Docket No. 129 (together the “Motions”). In support of this Objection the Objectors hereby incorporate their Objection to the Debtors’ Motion to Dismiss this case (the “Dismissal Objection”) filed contemporaneously herewith and respectfully represent the following:

1. For all of the reasons stated in the Dismissal Objection this case should be converted to one under Chapter 7 of the Bankruptcy Code. Therefore, there is no need, or basis,

to extend the exclusive periods under 1121 of the Bankruptcy Code<sup>1</sup> or to set a bar date in this chapter 11 case.

2. Therefore, the Motions should be denied as moot.

Dated: February 5, 2018

Respectfully submitted,

MOSES & SINGER LLP

By: /s/ Mark N. Parry

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<sup>1</sup> Further, review of the record in this case indicates the exclusivity period to file a plan appears to have expired in November 2017 when the Debtor voluntarily adjourned the hearing on its exclusivity extension outside of the 14-day window for an automatic extension motion to be heard provided for in Local Rule 9006-2.